

PC:MMS  
F.#2008R01729

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

-against-

No. 09-CR-718 (SJ)

JUAN CARLOS ESCOBAR GONZALEZ,

Defendant.

- - - - -X

The government respectfully requests that in addition to the Court's standard questions, the Court ask the following questions in jury selection for this case. The government respectfully submits that the questions listed below would aid in the selection of a fair and unbiased jury.

1. Do you have any feelings about immigration that would affect your ability to be fair and impartial in this case?

2. Does the fact that the victim was an illegal immigrant affect your ability to be fair and impartial in this case?

3. Have you, or any family member or close friend, ever been accused of sexually inappropriate conduct or a sexual crime? If so, would that fact affect your ability to be fair and impartial in this case?

4. During the trial, the government expects to introduce evidence relating to cell site data. Do you, or any family member or close friend, have any specialized knowledge about cell phone technology?

Dated: Brooklyn, New York  
October 11, 2011

Respectfully Submitted,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Marisa Megur Seifan  
Assistant U.S. Attorneys  
(718) 254-6008

cc: Clerk of the Court (SJ) (via ECF)  
Michael Schneider, Esq. (via ECF)